



The Commonwealth of Massachusetts  
**STATEWIDE EMERGENCY TELECOMMUNICATIONS BOARD**  
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*Lieutenant Governor*

**ROBERT C. HAAS**  
*Secretary of Public Safety*

**PAUL J. FAHEY**  
*Executive Director*

May 17, 2006

**VIA ELECTRONIC MAIL AND U.S. MAIL**

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, Massachusetts 02110

Re: D.T.E. 06-33 – Long-Term Plan for Funding Enhanced 9-1-1 Service

Dear Ms. Cottrell:

Enclosed for filing in the above-captioned proceeding, please find the  
Written Comments of the Statewide Emergency Telecommunications Board.

Thank you for your attention to this matter.

Sincerely,

Paul J. Fahey  
Executive Director  
Statewide Emergency Telecommunications Board

Enclosure

cc: Tina W. Chin, Hearing Officer

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Investigation by the Department of Telecommunications  
and Energy on its own Motion to Develop a Long-Term Plan  
for Funding Enhanced 9-1-1 Service

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**WRITTEN COMMENTS  
OF THE  
STATEWIDE EMERGENCY TELECOMMUNICATIONS BOARD**

Pursuant to the invite of the Department of Telecommunications and Energy (“Department”) in its vote and order in D.T.E. 06-33 to open an investigation to develop a long-term plan for funding Enhanced 9-1-1 services in the Commonwealth, the Statewide Emergency Telecommunications Board (“SETB”) hereby submits its initial written comments in this proceeding.

The SETB wishes to assist the Department by identifying issues affecting the Enhanced 9-1-1 system in Massachusetts, particularly as relates to the costs of the system and the technological changes required to keep the system current. Since the SETB was established by the Legislature in 1990, the Massachusetts Enhanced 9-1-1 program has been one of the strongest and most innovative in the United States and it is of mutual interest to all parties that this tradition continue as a future funding plan is developed.

Since the Legislature enacted new wire-line and wireless Enhanced 9-1-1 enabling statutes in 2002 (Chapters 61 and 239 of the Acts of 2002, respectively), the SETB has entered into contracts with Verizon New England, Inc. to provide all aspects of Enhanced 9-1-1 service in Massachusetts; these contracts include an equipment replacement program to ensure that all Massachusetts Public Safety Answering Points (PSAPs) are converted to computer-based telephony systems by 2007. Future funding of the Massachusetts Enhanced 9-1-1 program will require adequate resources to maintain and upgrade this new equipment.

The major technological change that has already changed the paradigm of Enhanced 9-1-1 is Voice over the Internet Protocol (VoIP). This new technology presents a number of challenges to the traditional Enhanced 9-1-1 model in terms of locating the caller; the Federal Communications Commission has issued an order requiring VoIP carriers to provide enhanced location information on an expedited schedule. The SETB needs to ensure that all Massachusetts PSAPs have the ability to receive that information to assist callers who are uncertain as to their location.

The funding challenge that VoIP technology has already presented is that the SETB receives no surcharge revenue from VoIP customers; the migration of previous wire-line customers to both VoIP and wireless phone service has resulted in a consistent decrease in wire-line Enhanced 9-1-1 revenue since the Wire-Line Enhanced 9-1-1 Fund was established in 2003. Though the Wireless Enhanced 9-1-1 Fund will capture the revenue migration for that technology, there is no similar mechanism to capture revenue from VoIP phone users.

The model that should be considered by the Department as it prepares this plan is one that would capture surcharge revenue from ANY device that can access the 9-1-1 system, whether it be wire-line, wireless, VoIP or some other technology. This revenue should then be deposited into a single “Enhanced 9-1-1 Trust Fund” to pay for all necessary expenses for the SETB to operate the Massachusetts Enhanced 9-1-1 system.

The National Emergency Number Association (NENA) Next Generation E 9-1-1 Partnership issued a report in March 2006 titled “Next Generation 9-1-1: Responding to an Urgent Need for Change”. (The SETB has played a key role in this process; the Executive Director serves as Chair of NENA’s Regulatory & Legislative Affairs Committee and as a member of the NENA NG E 9-1-1 Program Management Team). The report can be found on the NENA website at [www.nena.org/media/files/ng\\_final\\_copy\\_lo-rez.pdf](http://www.nena.org/media/files/ng_final_copy_lo-rez.pdf) and is an excellent resource for the Department as it considers these issues. It outlines seven (7) basic principles to guide the future funding discussion for Enhanced 9-1-1: (1) 9-1-1 funds must be used for 9-1-1 purposes; (2) Funding from all access methods; (3) Technology and competitively neutral; (4) Equitable allocation of revenues; (5) Constantly evolving system focused on improving service levels; (6) Efficient, accountable operations; and (7) Coordination, cooperation & collaboration.

These principles are already part of the philosophy of how Enhanced 9-1-1 is structured in Massachusetts, which also has the unique challenge of also funding disability access programs (relay center for deaf callers, specialized customer premise equipment, and amplified payphones) from the current wire-line Enhanced 9-1-1 revenue source. The SETB believes that these programs are not inconsistent with these principles.

Another question for the Department to consider is whether the SETB mandate should be broadened to include other public safety emergency communications missions. The current funding model, while protecting 9-1-1 revenues for appropriate uses under the statutes, also constrains the SETB ability to address other issues such as interoperability, other N-1-1 systems (2-1-1 for human services referrals, 3-1-1 for non-emergency public safety, 5-1-1 for transportation information), and community notification systems.

The Department should also consider whether to support a broader definition of the state role in funding Enhanced 9-1-1 costs beyond the SETB's model of providing the system to municipalities at state expense while relying on local funding of facility and personnel costs. The SETB is now considering this issue relative to possible establishment of a "PSAP Training Fund" to reimburse municipalities for a range of training expenses.

The SETB is working on a strategic planning process and hopes to have its findings available for the Department as it makes determinations about the next generation of Enhanced 9-1-1 and public safety emergency communications.

Respectfully submitted,

Statewide Emergency Telecommunications Board

BY:



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Dated: May 17, 2006